



Federal Communications Commission
Washington, D.C. 20554

January 11, 2006

Pursuant to Public Notice DA 05-3288, released December 22, 2005, the Wireline Competition Bureau hereby files the attached material related to SMS/800 Update 16.3 for inclusion in the record in CC Docket 01-92.

Material provided by: AT&T

Date: August 19, 2005.

For further information, contact Randy Clarke of the Pricing Policy Division, Wireline Competition Bureau at (202) 418-1530, or randy.clarke@fcc.gov.

Judith Nitsche

From: Regina Brown
Sent: Friday, August 19, 2005 4:16 PM
To: Judith Nitsche
Subject: CIC 0110 Info.

Judy -

Jonnie Bond from AT&T forwarded this info. to me today. Thought I would pass it on.

Regina,

Here is the specific detail material we forwarded to the group in support of the last diagram and the solution. The SMT did respond that this material was received too late to incorporate it into the PowerPoint.

Inappropriate Billing Created Today by Unauthorized Use of CIC 0110 Routing (pre-SMS/800 Feature Release 16.3)

- Originating LEC (ILEC "VO") produces an Originating Access Record which is used to bill ORIGINATING INTERCARRIER COMPENSATION CHARGES, including the TOLL FREE DATABASE QUERY CHARGES, to the Terminating LEC (CLEC "AT"). Terminating LEC (CLEC "AT") is **unaware** that it's local network is being used to complete CIC 0110 traffic; this will lead to a billing dispute between the LECs.

NOTE: Determination of "who to bill" is based on the NPA-NXX of the terminating number. This conforms with industry guidelines (ATIS/OBF-MECAB) which identify the Terminating LEC as the entity responsible for paying intercarrier compensation. In fact, the standard switch recording does not provide information to enable billing an entity other than the Terminating LEC, e.g., to the RESP ORG.

- Absent a contractual agreement between the Originating LEC (ILEC "VO") and Terminating LEC (CLEC "AT") that addresses End User billing requirements and the need for the Originating LEC to provide End User Billing Records to the Terminating LEC, CLEC "AT" will not be able to identify the Toll Free Service Customer or bill that Customer for the service to offset the Access/Query expenses. If End User Billing Records are provided, the Terminating LEC may incur extra-ordinary usage delivery fees (e.g., CMDS) and internal processing fees to produce a manual, ad-hoc bill to the Toll Free Service Customer.
- Absent a contractual agreement between the Originating LEC (ILEC "VO") and Terminating LEC (CLEC "AT") that addresses the special intercarrier billing requirements of CIC 0110 Routed Calls, the ILEC "VO" will be inappropriately billed by the CLEC "AT" for TERMINATING INTERCARRIER COMPENSATION CHARGES.

NOTE: Due to signaling/recording limitations, CIC 0110 Routed Calls require unique arrangements between the LECs to correct and adjust for a known over-billing situation that occurs when terminating switch recordings are used.

- Terminating LEC (CLEC "AT") will be identified as the Completing Carrier responsible for PAYPHONE COMPENSATION. Terminating LEC (CLEC "AT") is **unaware** that it's local network is being used to complete CIC 0110 traffic; this will lead to a Payphone Compensation

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disputes.

- Signaling, Recording, and Billing Processes do not adequately accommodate CIC 0110 calls without special processing and business rules. Advance agreement and authorization among the carriers is needed to insure that all parties involved in the call either receive or pay compensation, as appropriate to their role in call completion.

Appropriate Billing Assured Tomorrow with Authorized Use of CIC 0110 Routing (post-SMS/800 Feature Release 16.3)

- Eliminates Intercarrier Billing Disputes. Originating LEC (ILEC "VO") produces an Originating Access Record which is used to bill ORIGINATING INTERCARRIER COMPENSATION CHARGES, including the TOLL FREE DATABASE QUERY CHARGES, to the Terminating LEC (CLEC "AT"). Terminating LEC (CLEC "AT") is **aware** and approving that it's local network is being used to complete CIC 0110 traffic; CLEC "AT" will validate and pay the bill.
- Enables End User Billing. With a contractual agreement in place between the Originating LEC (ILEC "VO") and Terminating LEC (CLEC "AT"), ILEC "VO" will provide End User Billing Records to CLEC "AT" through the most cost-effective record exchange process. CLEC "AT" will have a billing process in place and will use these records to bill the Toll Free Service Customer.
- Addresses Unique Billing Constraints. With a contractual agreement in place between the Originating LEC (ILEC "VO") and Terminating LEC (CLEC "AT"), ILEC "VO" And CLEC "AT" will make appropriate billing adjustments, using a format and methodology that they mutual agree upon, to negate any overbilling situation.
- Eliminates Payphone Compensation Disputes. Terminating LEC (CLEC "AT") will be identified as the Completing Carrier responsible for PAYPHONE COMPENSATION. Terminating LEC (CLEC "AT") is **aware** and approving that it's local network is being used to complete CIC 0110 traffic. CLEC "AT" will pay the compensation due.
- All parties involved in the call either receive or pay compensation, as appropriate to their role in call completion.